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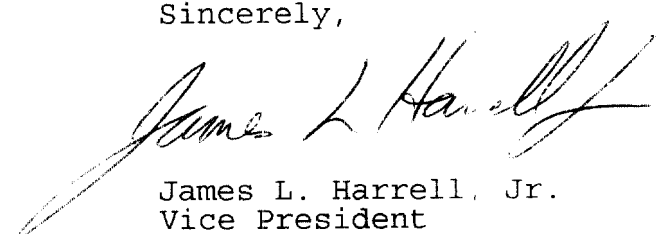
JANUARY 12, 1998

Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Secretary,

Enclosed is an original and four copies of Comments on the Proposed Rule Making, Docket No 97-234, to auction off competitive TV applications

Sincerely,


James L. Harrell, Jr.
Vice President
The Pentecostal Revival Association, Inc.

c/o WJGV-LP
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FEDERAL COMMUNICATIONS COMMISSION

In the Matter of

FCC # 97-397
DOC # 97-234

COMMENTS ON PROPOSED RULE MAKING

1. UNFAIRNESS OF ACTION TOWARD SMALL BROADCASTERS.

The Pentecostal Revival Association, Inc., the applicant

of Channel 63, application # 960917KI, wishes to comment of the unfair advantage that a larger and more affluent broadcaster will have over a small, but equally qualified applicant in an auction arena.

The Pentecostal Revival Association, Incorporated wishes to show to this Commission that the small, and less affluent, broadcaster may also be the one that should be the winner on the grounds of past dedication towards the community of service. This Commission should recognize that an auction, based on purely financial considerations, will not take into account the current service and past dedication given to a community by an equally qualified, but less affluent applicant.

The Pentecostal Revival Association, Inc., which owns and operates WJGV-LP, The Gospel Vision as it is called, has been serving the community of Putnam County, Florida for over 5 years with informational needs pointed solely at the licensed community. Major Community events that promote and help the impoverished in our society are aired free of charge for the public's interest. Programs promoting The Salvation Army, The Alzheimers Hospice Care, The Walk For The Needy are but a few of many worthy local organizations that WJGV helps to support.

All Putnam County Commission Meetings are aired over the Gospel Vision, WJGV, keeping the residents of Putnam County,

Florida fully abreast with the happenings of their local government. WJGV-LP also airs special meetings of The Putnam County School Board, The Palatka City Commission, The Putnam County Planning Board, and The Putnam County Zoning Board in order to keep the Putnam County, Florida resident better informed.

WJGV-LP airs and covers local political and election events. Local candidates are given prime time to express their views to the residents of the licensed community.

WJGV-LP fulfills the FCC's requirements for Children's Programming by broadcasting one full hour of programming for the children of Putnam County, Florida each weekday night. Some of these programs are originated locally.

Thus, The Pentecostal Revival Association, Inc. has provided an outstanding public service commitment with existing programming targeted directly at the community of service via its exiting low power television station. Channel 63 will not only further PRA's programming commitment to the community of service, but will also boast the Commission's policies for advancing commercial television usage of allotted reserved channels without adverse impact of the Commission's concerns in its ATV proceedings. WJGV-LP's application for upgrade to a full power TV station should be given to PRA solely on its past efforts to the community of service, and not solely on a dollar amount that

the Commission deems appropriate for sale of these channels.

The Pentecostal Revival Association, Incorporated hopes that this Commission will recognize that an auction based on a purely financial consideration would give an unfair advantage toward a larger and more affluent competition, who is only in the consideration of making a profit, and is not in the consideration of dedicating service to the community of license, which in this case is Palatka, Florida, a town of 11,000 people. The Competition will be looking solely at the major market 50 miles up the road, which is Jacksonville, Florida, and thus will not really be interested in advancing community service for Palatka, Florida, as does WJGV-LP.

Particular 2

In the early 1980's the Commission established rules which allowed for the existence of the Low Power Television Industry. The Commission created and established these rules to allow broadcaster the ability to go into communities of service, which might not be valued enough to expend a full power TV station. Further, the Commission recognized that this could be a stepping stone for a broadcaster to become a full power service, in that after first proving years of dedication as a low power secondary station, it might be allowed to become a full power station.

The Pentecostal Revival Association, Incorporated feels

that the Commission has not fully lived up to the promises given to low power industry concerning upgrades. Most low power TV stations, such as WJGV-LP, have never been given the avenue to become a full power station.

Therefore, this Commission should recognize that the low power industry will be dealt an unfair blow if an auction of a purely financial means were to be allowed. Low Power TV Stations, such as WJGV-LP, will be squeezed off the air and not give the opportunity first proposed. The dedication and service of a qualified Low Power TV Station should be weighed by this Commission. This Commission should give LPTV stations, such as WJGV-LP, the opportunity to advance towards a full power without having to expend the mega-dollars needed to ward off its competition.

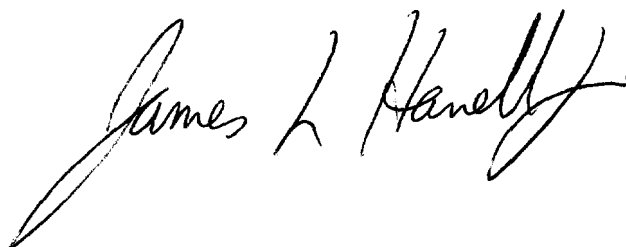
CONCLUSION

The Pentecostal Revival Association, Incorporated respectfully asks this Commission to recognize that an auction of TV channel allotments would be unfair to an existing Low Power TV Station, such as WJGV-LP, which is trying to upgrade. An auction would not take into light the dedicated service of WJGV-LP to the community of Palatka, Florida over the past 5 years of operation; and an auction would not allow for the opportunity of advancement into the

full power arena as spoken of by the Commission at the onset
to the Low Power TV Industry in the early 1980's.

Dated; January 12, 1998

Respectfully submitted,

A handwritten signature in cursive script, reading "James L. Harrell, Jr.", with a long, sweeping underline.

James L. Harrell, Jr.
Vice President
Pentecostal Revival Assoc., Inc.